

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VIRGINIA COLE, *on behalf of herself*)
and others similarly situated,)

Plaintiff,)

v.)

Case No. 3:25-cv-00639

GENSTONE ENTERPRISES, LLC,)

Defendant.)

**GENSTONE ENTERPRISES, LLC’S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant GenStone Enterprises, LLC (“GenStone”) respectfully requests, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 6.01 of the Local Rules for the United States District Court for the Middle District of Tennessee, that the Court enter an order extending the time for GenStone to answer or otherwise respond to Plaintiff Virginia Cole’s (“Plaintiff”) Complaint up to and including September 4, 2025. In support thereof, GenStone states as follows:

1. Plaintiff filed its Complaint on June 9, 2025.
 2. GenStone was served with a copy of the Writ of Summons and Complaint on July 14, 2025.
 3. GenStone’s current response deadline is August 4, 2025.
 4. GenStone is still reviewing and investigating the allegations in the Complaint.
- Accordingly, GenStone respectfully requests an extension through and including September 4, 2025 to file its answer or other responsive pleading.
5. Counsel for Plaintiff have advised that they do not oppose this motion.

6. This request is not made for the purpose of delay or harassment, and no party will be prejudiced by the additional time for GenStone to answer or otherwise respond.

7. This is GenStone's first request for an extension of time to answer or otherwise respond to the Complaint.

8. GenStone reserves all defenses and objections to Plaintiff's Complaint.

WHEREFORE, GenStone respectfully requests the Court enter an Order extending the time for GenStone to file its answer or other responsive pleading up to and including September 4, 2025.

Dated: July 31, 2025

/s/ John W. Peterson

John W. Peterson (# 26136)
POLSINELLI PC
501 Commerce Street, Suite 1300
Nashville, TN 37203
Tel.: (615) 259-1523
Email: john.peterson@polsinelli.com

*Counsel for Defendant GenStone
Enterprises, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2025, I electronically filed the foregoing *GenStone Enterprises, LLC's Unopposed Motion for Extension of Time to Respond to Plaintiff's Complaint* with the Clerk of Court using the CM/ECF system, which served the same upon the following counsel of record:

Anthony I. Paronich
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Email: anthony@paronichlaw.com

Scott Alan Lanzon
The Lanzon Firm
550 W Main Street, Suite 550
Knoxville, TN 37902
Email: scott.lanzon@gmail.com

Counsel for Plaintiff

/s/ John W. Peterson

John W. Peterson

*Counsel for Defendant
GenStone Enterprises, LLC*